**WorkforceGPS**

**Transcript of Webinar**

**Eligible Training Provider Reporting:**

**Requirements and Tools for Reporting - Part I**

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JON VEHLOW: Welcome to "Eligible Training Provider Reporting Requirements and Tools For Reporting, Part 1." So without further ado, I'd like to turn things over to our moderator today, Andy Ridgeway, supervisory workforce analysts, U.S. Department of Labor, Employment and Training Administration. Andy?

ANDY RIDGEWAY: Thank you John, and good afternoon. Good morning for some of you and if you're in other time zones, good evening possibly as well. We have a very, very big audience today. So we're very excited to talk to you today about eligible training provider reporting.

We noticed that we have people from the state workforce community, the local workforce community. We have the eligible training provider, community, the apprenticeship community. This touches on all those communities and probably others that I haven't mentioned. So you're in the right place if you're here to listen about eligible training provider reporting for the Workforce Innovation and Opportunity Act.

And I'm excited today to be moderating today's presentation along with a few of my colleagues here today. We have Christina Eckenroth, who's in the Department of Labor's region one and the Employment Training Administration. My colleague Kellen Grode with the Employment Training Administration as well. And Matt Gee from the University of Chicago who will kind of go over some tools that he's been working on that will help states and locals and training providers meet some of the reporting requirements that we'll be going over today.

So just a quick overview of some of the objectives. We taking a step back. We think, you know, this has been a longtime coming, dealing with eligible training provider reporting. It is something that is in the Workforce Innovation Opportunity Act. It is something that has been talked about for a long time and I believe we're just now getting into starting to understand and clarify what it is that we're wanting to collect.

And really it's a matter of taking a step to put our money where our mouth is and invest workforce resources with, with the information of the data. So using data to inform workforce investments is a huge goal of this. And this is one small piece of that, but we're very excited to go over that today. And one housekeeping matter. So keep typing in as you log in, who you are, where you're from and all that.

But throughout the presentation as questions come up, feel free to type them into the welcome chat because we may or may not be able to get to them all today, most likely we won't be able to get to them all today, but we will be doing future webinars where we will dedicate that time to going over some of your questions.

So throughout the presentation, send in your questions and your comments and if we can today, we will in the near future get to those questions and we'll address them because we're sure there's a lot of them because real recently on August 31st, the department issued Training Employment Guidance Letter 3-18, which is kind of what this Webinar is going to go over, some of the requirements mentioned in the TEGL as well as some common questions that have come up. And so we're excited to go through that as well.

So we encourage everyone to look at Training Employment Guidance Letter 3-18. We'll be talking about it a lot throughout this presentation. So we just really encourage and point you to that direction as a key resource for you going forward. And so throughout this presentation we're going to talk about as they do in the TEGL the performance factors for determining initial eligibility, performance for determining continued eligibility and then the performance reporting requirements of -- of WIOA and there's some key distinctions between them which count and Cristina, we'll go over in this presentation. So we're really excited to get into that.

I will try not hold up that key part of the presentation any longer. We do, I believe, have a couple poll questions that we do want to get a knowledge check. John, if you want to pull those up for us. The first one is how prepared are you for PUI 2018 Eligible Training Provider Performance Reporting. So we understand that this is a new process and a new requirement for many places. So we do want you to be honest with us.

We didn't give you an option to say I have no idea what this is. So not at all for that, but going ahead and answer that because we do want to know where everyone is with that. So this is somewhat, I think what we expected where most people are at the somewhat or not at all prepared, which that's not terribly surprising since we just issued the guidance a couple of weeks ago and it is an entirely new concept for a lot of us.

So I don't think there's a whole lot of surprise there and hopefully through this presentation you'll be able to move from not at all to somewhat and from somewhat to very in the not too distant future. So thank you for that. And we'll go ahead and do the next poll question.

So kind of building on that. So most of you did answer that you are somewhat or not at all prepared for ETP performance reporting. So we have to address our concerns. We do have several options here, but what's primarily the main concern that you have with it. And we know that you're coming from different perspectives, whether it's state, local, training provider, something else entirely. So it's a pretty good mix and we do ask that if you do put other, you go in and put it in the chat so that we know where maybe we can provide some technical assistance in the future as well.

So it looks like it's pretty well spread out, but it looks like the biggest one is internal procedures or policy barriers, which we agree that's probably a big thing that hopefully this TEGL will start to address as states can look at this TEGL and update their policies and procedures. The next one is provider concerns. We do understand that that is a valid concern, some of the reporting requirements.

So we'll hopefully work to minimize some of the burdens associated with that. And then MIS capacities, another issue that's been flagged. So that's good. I think we're pretty well keyed up to go ahead and get into the meat of our presentation.

And with that I will turn it over to my colleague Kellen Grode to start talking about the ETP performance requirements. Kellen?

KELLEN GRODE: Thanks, Andy. See if I can get this slide to show up here. We're showing a blank for some reason. There we go. So I think one of the first things, and Andy kind of cued it up for us, is that we wanted to talk about more generally sort of where performance -- past it, I guess -- where performance comes in to play with ETPs it. And it comes in a variety of ways under WIOA.

So the first one that we talked about or that we've mentioned before, that we wanted to go into little more detail right now is with initial eligibility for training providers. And so this is the part where you get the provider onto the list. And so, as you can see on the slide here, the first bullet point really is the key one, I think for folks to know with respect to performance and eligible training providers trying to get on the list, which is that the law requires that a factor related to the indicators of performance has to be used as one of the eligibility criteria. For states, this can be a variety of different things.

So they do have some flexibility in determining what that factor is as far as the department's concerned with relation to that, is that we want to see in state's policies in their state plans what that factor is, how, how they're making that, they're using that information to make that eligibility determination. We want to see a policy that does meet that requirement.

And so as a reminder for folks, one of the things that is mentioned is that it says, you know, as describing WIOA sections 1:16 (b)2a, I through IP that's a long way of saying that it has to be related to one of four WIOA primary indicators of performance which are the employment second rate, employment rate, second quarter after exit employment rate, fourth quarter after exit, median earnings in the second quarter after exit, or credential attainment.

For those of you who are more familiar with the WIOA primary indicators of performance, you'll note that this does not include the two other primary indicators which are measurable skill gain and effectiveness and serving employers.

MR. GRODE: The other component that's not related to the reporting of performance directed to the department, but that does relate to eligible training provider, the eligibility for training providers is the continued eligibility requirements under WIOA, which is the way that providers stay on the list.

And so this requirement is more explicitly defined as using those four WIOA primary indicators of performance that I just discussed. And so it does specifically state in the law that the performance accountability measures must be taken into account in developing your continued eligibility criteria for the state.

And so you'll see here in the two sub bullet points, one is specific to the performance of WIOA participants and then there's also the outcomes on the performance for students in general with respect to their employment and earnings. And so those are both factors that must be included in state's eligibility requirements for continued eligibility of training providers. And we did have a quick question that popped in when we were talking about the factors on the initial eligibility.

It said, "Does it say it only needs to be linked to one of the four primary indicators of performance?" I think there is flexibility in the initial eligibility, so that will be up to the states to say does the factor relate to one of the four or does it relate to all four? That would be something that would be determined through the state's policy.

The last thing that I would like to say with respect to the continued eligibility is that we have gotten a lot of questions about when the eligible training provider performance reporting to the department starts with respect to a new provider that gets on the list and whether or not outcomes have to be reported back to the beginning of a program here, for example.

And what our position on that is that the requirement to collect on the WIOA performance indicators for an eligible training provider starts at the moment that they get on the list. It does not go back to before they were on the list. And so that's when those requirements would actually, to collect that information would start for those providers.

And with that I'm going to turn it over to Christina to get more into what the report to the department looks like.

CHRISTINA ECKENROTH: Thanks, Kellen. Hopefully you've had the opportunity to look at the TEGL if you have it, never fear. We're going to highlight, provide some highlights here so you can go back and read more closely. And so that's what I'm going to go over broadly speaking in this section. Some things to keep in mind, the report states are required to submit Eligible Training Provider Performance reports for all programs of study. That is different than all providers. You may have a number of programs of study approved under a single provider.

So programs, each program of study, the information is what we're looking for there. There is of course an exception and that's where registered apprenticeship. So our registered apprenticeship providers, hopefully, you are all aware that you are not required to report performance information in order to be on the list.

So if you're associated with a registered apprenticeship program, you're not required to provide performance information. The reporting on all students both WIOA and non-WIOA. This has been an area of interest for folks, so what's the requirement? The performance reports are to include information on everyone served by the program of study. We are looking for information on all students served, even those students who are not WIOA participants.

There are, however, different requirements and breakouts for students who are WIOA participants. So I recommend that folks look at those closely and we'll touch on them here a little bit. All of that required information is defined in the ETA 9171, which is the numerical labeling of the report for ETP performance reporting, OK?

So outcome information on all students is going to include a couple of things. Information on employment, information on earning, and information on credentials. Outcomes for information on WIOA participants is very similar, but we're also going to be looking for demographic and employment barrier information on those WIOA participant and that is required. OK, so now you're probably asking, wait, wait, wait, who's reporting what and how exactly are they reporting that? And for this section I'm going to turn it back over to Kellen.

MR. GRODE: Thanks, Christina. Hopefully clarify these things a little bit and as we sort of mentioned before, a lot of this information is also included in that Training and Employment Guidance Letter 3-18. So if you're confused at all, you can always jump back to that and look at that information there as well. So the first place we wanted to start with on this is how are the reports submitted?

The who of the how the report is submitted is, states are required to submit the annual ETP report to the Department of Labor. This is not something that would be submitted to DOL by training providers or by local areas is the states that have that responsibility to submit it to the department, whereas submitted in our Workforce Integrated Performance System, commonly known as WIPS and the files -- the "how" -- is the files must be submitted in .CSV or .TXT format. Currently, we don't anticipate needing .zip files for these, but if that does come into play we will, we will look at making that addition as well.

And when must they be -- they be submitted? The first report is due for PY 2018 on October 1, 2019, so that'd be the first time that there's a required submission. Now I will know that WIPS is currently able to accept ETP reports, so for states that want to make attempts to see just to make sure that their system's working right or have old data that they want to see what the reports look like when you submit them, I think we would welcome that. We want to make sure that our system is working right in advance of that due date.

And so for folks that want to attempt the submission, they are welcome to do so right now. Moving onto the next slide. Another question we get pretty commonly is "Who is responsible for collecting which data elements?" And so we kind of broke it out into two categories here. What the states are required to collect and what providers are required to collect. So states must assure that the necessary data is collected, whether it is collected by themselves or by the training provider. And then they should attempt to minimize the data collection burden on training providers.

Now this is what we said in 3-18. However, there is some data that must be collected by providers because they're the only ones that have access to it. And in those cases they must submit that to the state and that may be something that the state collects through the eligibility determination process to cut back on the amount of burden that's placed on providers to collect that data. I want to jump back to that slide real quick, sorry. And so one of the things that we want to know for stating that there is a lot of ways in which states can help to collect this data to minimize burden.

Things like using wage records to get performance outcome information on participants is one of the primary ways in which states can lessen the burden on providers for data collection rather than the providers having to collect those outcomes themselves. For the actual report in the ETA 9171, there are a few elements that we want you to know can be left blank on the rest beside of the ones on this list, have to have something submitted in them. But these are the few that can be left blank.

So for example, Element 100 is reciprocal agreements for other states. If the state, if you don't have reciprocal agreements, you don't have to fill it out. Again, the bullet point here says they should be collected and reported when appropriate. So these should only be blank if they're not applicable.

So if for whatever reason, there's no URL for the training program, then it can be left blank. If you don't have a second and third O\*NET SOC Code for the program, those can be less blank. But when it's appropriate, when it's available, these should still be recorded.

And now we want to get into a quick knowledge check on what we presented so far. So you're going to see some poll pop up, you know, answer to the best of your knowledge. We want to sort of see where you guys are at on these and we'll give you a little bit of time to answer and then we'll check in and see where folks are at. Looks like most of you have voted at this point. So we're going to go ahead and show the results.

OK. Yeah. I don't know folks heard that at all. We had a little bit of an echo in the room. Looking at the results, it looks like for the most part, folks, did that get these answers right. I would say the one that percentage-wise, looks the most off is on the first one. We had about 17 percent of folks say that ETP performance is not required for PY 18, but that is inaccurate.

So PY 18 performance reports are required, for eligible training provider performance reports to the department. So that's a good note. So just to quickly go through the correct answers for these, the first one is true. The second one states can leverage data collection to assist providers. That's true. We just mentioned that on number three, ETPs can report by institution rather than approved program of study that is false.

As Christina mentioned, they should be reported by program of study, not just the institution itself. And then the fourth one is also false. So ETP Performance Report is only for WIOA participants, as we mentioned. I think a lot of you are aware there is the requirement to collect certain data on all students served by the program and not just the WIOA participants.

So with that I'm going to hand it back over to Christina real quick to talk about some tools for reporting.

MR. ECKENROTH: Thanks, Kellen. So here are a couple of things we've provided for you to get you started if you are just beginning this process.

In the TEGL itself, and John can bring up the PDF here so it's a little easier to read. In the table itself, there is an attachment. If you look here, you'll see the attachment is enlarged right here. What you're taking a look at here is a suggestion based on, to leverage data to the extent possible. We've been talking about that. Here's a suggestion about the entity that's most likely to have that data and ways in which you can potentially leverage that information to relieve a burden on providers.

OK. So how you read this chart? The data element number on, the left-hand side that lets you know what the reporting number, the name is in the middle. The recommended data collection entity: this is based on the entity we think is broadly likely to have access to this information and whether or not it's required or optional.

So the example Kellen used previously, 100 is reciprocal agreements with other states. That's not something that providers are likely to have their finger on the pulse of, whether or not the state has a reciprocal agreement with a neighboring state. That's going to be something that they provide, if applicable.

Under the next training provider and program of service, that example, that could be mixed. It depends, but if you look at the information we have here -- the name, description, address, type of entity -- all of that is required and information that the state likely already has because the provider had to apply for either initial eligibility or continued eligibility. So leverage that application to the broadest extent possible is our recommendation. And then going down below, we have some other thoughts.

For example, all individuals, the total number of individuals served. Well, the training provider will have that information as a state is unlikely to have it for folks who are not participants. OK, so that's an example. And WIOA participants, much of this information will be already collected by the state in your eligibility and service files. For the PRL, you have to report it anyway. So here's the information suggested here.

For example, participants' characteristics. That's not information. The institution is likely to collect barriers to employment, you know, the average program of study, it's not going to know that kind of thing, OK? So that's what we recommend. We can go back to the slide here.

OK. So John, if you can move forward for me for an ETP information on Workforce GPS, we have a lot of tools available to you. There's a landing page, there's a discussion page for you Performance folks. There's a performance reporting Table 18, right. Here's the link for ease of use. Go to the next slide.

Some of you may right now have questions about waivers. Asking, "Is all a part of this able to be waived?" ATA has granted waiver request for these states on portions of the ETP reporting requirements. So the waivers that have been granted to date are specifically relating to these elements on the ETA 9171.

So that was waiving the requirement to report information on all individuals and that's specific to the 9171. If you are a state that has received that waiver, the next two bullets points are pieces of information for you to keep in mind. You still will have to report on a few elements in order to get through the logical edit checks and you're going to have to put your WIOA Participant information in 120 and 121.

So if you have a waiver, this is just a quick reminder to you of what's going to happen there. And with that I'm going to turn it over to Matt Gee from the University of Chicago with additional information about training provider outcomes and he can talk to the training provider outcomes tool kit or the TPOT. Matt?

MATT GEE: Great. Thanks, Christina. As have come up in a lot of the questions that you've already seen today's Webinar, there are a variety of challenges and issues that many of you who have begun to run into as you started these discussions within your states and localities and how you might be able to generate this data.

And we want it to be able to provide a set of tools that could help states and localities and the number of training providers more easily meet these new ETP reporting requirements and do it in a way that would comply with all the necessary data ethics and legal challenges in working with the necessary data agreements and allow for this data to flow relatively straightforward.

So we began an effort a few years ago called the Training Provider Outcomes Toolkit. And this is really an effort to bring together a collection of resources from a variety of organizations that are doing really good work directly related to WIOA reporting and work that actually can help support, WIOA reporting but wasn't initially actually thought through the lens of the WIOA reporting, but solves some of the key technical challenges and legal challenges that you might run into in meeting and in creating some of these core metrics.

And so we're going to walk through what we've learned over the last few years and working on this Training Provider Outcomes Toolkit and what's available to you now, what things will continue to be developed supporting your work and how you might be able to contribute to an open ecosystem of resources that support accomplishing and overcoming some of the challenges. Those fall into just a few key categories.

So these are the things we've learned in working with states through the training provider outcomes process, but that states and localities need. So first is case studies of state systems for WIOA reporting what's working and what some of the key challenges are.

Second is data sharing agreement templates and guidance; how can you get a few different state agencies that have disparate parts of data that you need to be real to bring together to be able to share data.

Third are actually just data definition. Thinking about the final report and stuff, performance reports that you've seen earlier in that Christina shared. What does that mean for what providers actually need to be able to share and what states need to be able to collect in order to create all those fields that you just saw.

Next, some data collection, validation tools. Providers have everything from no data at all to maybe an Excel spreadsheet or GoogleDoc where they keep information to more sophisticated CRM systems or databases. And being able to collect from that, a wide variety of data sources from providers has it been a shared need. Next, you need places to be able to store that collected data and provide that important record linking at the state level.

Next, being able to do some of the necessary data analysis and aggregation, creating those or metric scorecard and doing it in a way that ensures privacy. There's already been a variety of issues that have come up in the Q&A that some local community colleges might interpret this notion of all participants as violating purpose. How can you do that in a way that actually insures privacy preservation and also can help comply with reporting requirements?

And then lastly controls for just making it so that those of CSP that can get generated, can be easily shared with TA, and potentially as a broader, more open data resource for other folks to use. So we're going to walk through some of the key resources really quickly and feel free to type in your questions in chat as we're going through.

So the first resource was unused cases that I would point to is a joint report that we helped put together with NASWA/NAWB that came out just a few months ago. It's got some great resources in there, multistate surveys and assessments, where different state systems are, what some of the challenges are, profiles of progress and acceptance in a few states and some recommendations that if you are a state agency or you're working with one you can point to and learn from.

Next, one of the big challenges that's already been addressed in some of the questions that have been shared in especially to get at some of those wage and employment outcomes that are in that funnel of guidance, having data sharing between state agencies for linking unemployment insurance records is really critical and it's critical on a couple of different dimensions.

One is that sometimes there needs to be data sharing agreements between state departments of higher education and State Departments of employment in order to mutually support WIOA reporting without duplicative effort.

But second, as has come up again in the chat today, a lot of providers may have challenges or concerns with collecting Social Security numbers which are necessary for linking with unemployment insurance records. And so some states have worked out a data sharing agreements, not just with the employment and a higher ed offices, but also their secretaries of state, the running the department of motor vehicles and created what are called Master Plan Indices (Master Planned Index) that allow for record linkage with just names and birthdays and addresses -- the information often classified providers.

On all of that, some great guidance on how to do this along with templates of data sharing agreements that you're state can start using are available on a great website statedatasharing.org that can answer any questions that you have on that. They did an amazing job putting this together.

Next, is a set of data sheets and field definitions for providers. One of the things we found in talking with and working with states is understanding how the final guidance really, what it implies to the data that needs to be collected by providers on the individual participants on the program level information, central information, etc.

And so as part of the toolkit and we keep our data definitions that unpack some of that data collection, or field definition, that hopefully will be helpful to you as you think through and implement WIOA data collection from providers. And links, again, are there. All of the code and resources they we link to, again, are openly available. It's also available under what's called an open source license. So anyone is free to use it, contribute to it, add to it freely.

Next, our data collection and validation, best practices and tools. One of the challenges that a lot of states run into are the ability to be able to get data from a broad sort of training providers that have a real high variability in data capacity to making it easy for our training providers, that my just have a single spreadsheet where they have information, to be able to upload that, validate those particular fields that they need in order for the state to be able to link the records and generate that final report is really important.

So part of what we've built through the training program toolkits process and as a community contributed effort is a set of three uploading tools that are easy for states to deploy on their own infrastructure or work with their existing vendors to be able to use freely and be able to more easily collect data and validate it during the uploading process so that you know you're getting high quality data and don't have to go back and forth with emails with providers.

Next, is one of the challenges of just having that data that's collected, be able to be linked with state records. Again, the goal is try to keep it as simple as possible. A lot of states we've talked to, instead of having to go through a big giant RFP process to create a brand new system, be able to do it.

The right way to do this in a really lightweight way where you can just have a very simple data flow and lightweight database that can handle some of the record linkage and some of, each of those things are actually part of a reference implementations of each of those tools are part of the TPOT toolkit linked below, as well as some tools for making it easier for states to be able to link records, whether those be linking with Social Security numbers or linking up with what's called fuzzy matching, for names, addresses, birthdates, etc. And that's linked there as well.

Next, being able to ensure that you at the state are able to create the right set of outcomes metrics for WIOA while also preserving privacy in working ways. So part of the tool kit that we rolled out, something called Abacus, it generates all of that. All of those key measures that you've seen shared before and does it in a way that allows you as a state to find a particular privacy cutoff, especially the number of individuals that need to be in that particular program in order for the median wage to be calculated in a way that it should.

And all of these things are done in a way that are really meant to help ensure privacy by making it possible to even have the UI data not have to be commingled, all the participant records in order for those outcomes we captured.

And then lastly, one of the best practices we started seeing with states is thinking about the WIOA data collection and generation and reporting process as an opportunity to really create new beneficial, valuable open data for the broader community of folks that are building applications that are meant to help folks find training programs in your area, in your region or in your state.

And so some states are starting to think about their new performance report data as not just data that might go on a static state website and reported up to the FPA, but also that they can make available through their state data portal, open data portals and through things like application programming interfaces or APIs so that new folks can build on top of that data and integrate it into their grid tools that are helping individuals connect with training and education programs in their area.

There's a lot of guidance on that as well as for the tool kit. All this is ongoing. We are collecting new tools as states and localities written them to us. They developed new tools that they contribute to the tool kit to make it easier for you and having opportunity and a space for technical discussions about implementation or really wonky things like, "How do you solve a fuzzy matching for non-SSN?"

You can go to slack dataatwork.org as a community open community discussion board for technical issues related to TPOT to help. And we've got a set of community actors as well as our media folks representatives call that can help aptly answer your question. So with that, I'm going to turn it back over to Andy.

MR. RIDGEWAY: Thanks, Matt. So we've thrown a lot at you today. There's a lot of resources available out there and I do want to take a quick minute to highlight some of those resources. So throughout our presentation we've talked about the new Training and Employment Guidance Letter 3-18. That really is, we do really encourage you to read up on that if you haven't yet because that's kind of the foundation of where these requirements are coming from.

And of course, there's Training Employment and Guidance Letter 41-14, Change 1. That's been out there for a while, but that kind of gets into the initial eligibility issue regarding eligible training providers. So if you have questions regarding that, we encourage you to check that out. And then all of the resources that Matt went over is available at the TPOT page, which we think is very helpful for states and locals to kind of help piece together some of these requirements because as Christina mentioned, there'll be at different levels, different entities will have some of the data that ultimately gets reported to DOL.

So we'll get into that here in a little bit. And then if you're looking for the kind of, the backbone and the rules regarding the ETP reporting, we do have the links to those and we do have a WorkforceGPS page dedicated specifically to ETP reporting and I believe on that page there, as part of the broader page, there's opportunity for discussion and sending questions in that way as well, which we are responding to. I think we do have a little bit of time to do some questions.

So I will go through some of those questions that you sent. Again, continue to send them in throughout the presentation. We have about 15 minutes here. So the first one that I will see if Matt can get to. Matt, I don't know if you have it in front of you, but there's a question about the need to collect participant level data, including Social Security numbers to utilize wage records from providers and then they ultimately get aggregated to DOL.

You know that there are some concerns about security or burden. There's things like that out there and I believe, do some of your tools help regarding that? And if so, could you speak to that a little bit? Some of the security issues with SSNs, Matt?

Matt Gee: Sure. That's a great question. So one of the things we've seen in spaces being able to generate high quality outcomes data by linking to a UI wage record is it does actually lessen the data collection burden for providers. You're not having to go and call up your alumni and ask them and try to track down to seven percent of folks who will actually answer your calls to figure out what those meeting earnings are and whether they're employed.

But you trade off that burden to the writers in following up with their alumni, with the potential risk of, you know, collecting and storing and transmitting sensitive data like Social Security numbers. So there are a couple of things that we worked to try to mitigate those work to do, to try to mitigate those risks as part of TPOT. One is again, making it possible for record linkage that doesn't require Social Security number.

So if you're already creating, if you're already collecting names, birth dates, addresses -a few fields that can allow for record linkage -- and your state has the right set of data sharing agreements in place, some states are actually able to collect that data from you as a provider and link it without substituting numbers. Not all states are in that fight yet and might not be there by October of 2019. We were also working on a few different pieces. One is alternative data flows that go along with that kind of record linkage but to do it in a little bit more secure way.

What that means is you essentially do collect Social Security number temporarily and you get that Social Security number with the uploading tool that we showed in the webinar. You actually just stored on your own service or in a spreadsheet, on kind of a very short order and change it to an ID that is shared with the states.

And this is one of the components of the TPOT toolkit that then can be used forward without a Social Security number being the ID of notice. And that is one of the tools in the toolkit. It's something that is done in a few other areas besides a WIOA reporting. And so there's a good precedent for it. And it is another way of reducing the risks to individual providers and states for exchanging Social Security numbers.

Lastly, if you really have to collect and transmit those numbers, all the tools you recommend that both can be and are by default deployable in a way that does something called encrypting the data in transit and encrypting the data at rest. So it reduces the security burden to folks using Social Security numbers as the identifier. Hopefully that helps.

MR. RIDGEWAY: Thank you, Matt. Appreciate it. That is something that is very important throughout this process. And thank you for your answer on that. I think we'll do a couple other questions.

One, I think we've probably answered throughout the presentation by I do just want to go over it because it's kind of a loaded one and that is, "Who has to do the reporting?" So that was one of the first questions that we got and I realized this is kind of where you sit is where you stand type of question because to DOL the reporting is required by the states.

So the states are open to state workforce agencies are required to submit to DOL the reports. We understand that just because that's the statement, that doesn't mean that everyone else doesn't have to do any reporting. You may not be responsible for reporting to DOL, but you may be responsible ultimately for reporting to the state some of that information in order to help them fill out the report.

So we do understand it's a simple question but there's a loaded one. So we do want to make sure that we are clear that for reporting to DOL it's the state, but there will be additional reporting responsibilities in order for the state to meet a requirement to submit the DOL. So just wanted to go over that.

The next question was from an apprenticeship intermediary who just got their standards approved. So first of all, congratulations. And then they were asking what's approved, what do we need, who do we need to contact to get on the ETP list. So I mentioned earlier TEGL 41-14 Change 1 talks about the initial eligibility for eligible training providers.

And if people don't know, we want to make sure they'd know now that registered apprenticeship programs are automatically eligible to go on the list for ETPs. States were required as a result of that to develop a process for getting registered apprenticeship programs on the ETP. So without knowing the specific state you're in, we would generally encourage you to contact your state workforce agency if you are a registered apprenticeship program about how to get on the list if they haven't already contacted you about getting on the list.

So that's something we can follow up with in the future. But if you are a registered apprenticeship program, we do want to make sure that you get on the list, whether it's through the state's outreach to you or your outreach to the state. So we wanted to be sure and address that.

The next one I'll turn over to Kellen to answer. So Kellen, there's a question about on slide nine in your presentation, "What constitutes addressing a factor?" Do you want to provide a little context to the question itself and then also the answer.

MR. GRODE: Sure. So this is, it's a good question and it's one that, basically it relates to, for the initial eligibility of eligible training providers, the requirements that we mentioned where there has to be some component of the eligibility criteria that is addressing effect or relating to one of those four performance indicators that we discussed.

And so the question of what constitutes addressing a factor, what we, what our position on it is that it is going to be up to the policy of the state. So states are the ones that will set the policy of what it means to address the factor relating to one of those performance indicators. So it's going to vary state to state what exactly constitutes addressing a factor.

MR. RIDGEWAY: OK, great. Thank you. Kellen, I think I'll hand it back to you for this next one, which I believe we did answer in the presentation, but it is so important that I think it's key that we go over it again. And that is so it's the reporting criteria for students. Does that apply for students within the state or is it all students or what exactly is the requirement for all students? Just to go over that again.

MR. GRODE: Yeah. And so I think there's probably, this is a complex question and so I think there's probably a few layers to it, right? There's the all the students requirement component where, you know, WIOA requires that you report on not only the participants that are WIOA participants served by that program, but all the students that are served by that program of study.

Now, I think my guess is that this question is more targeted to the idea that a program of study may have students that are in multiple states and so they want to know if they are required to report on those students that are served in other states as well. The answer to that is yes.

And so that's one of those places where is important, like it is useful to a lot of times have those reciprocal agreements with other states because then you were able to work together to gather that information on students in multiple states, on behalf of the providers if applicable. So I think that's where you're going with that. And the answer is yes, it is for all students served by that program of study.

MR. RIDGEWAY: OK. Thanks, Kellen. So then the next question that we will go over relates to when Christina was giving her part of the presentation, "Is the requirement for the provider as a whole or is it just the program from a provider that is part of a cohort of an apprenticeship?" So this deals with apprenticeships and whether or not they have to report or do they have to report to the non WIOA participants? So anyways, there's a question about apprenticeship and reporting and Christina, can I turn it over to you to answer that one?

MR. ECKENROTH: Thanks Andy. Similarly to Kellen's question, I think that it's probably got several factors. If you are on the eligible training provider list solely as a program of study providing the technical education for apprenticeship -- if you're a provider for apprenticeship -- then you don't need to report performance information. There's not a requirement.

If you want to accept other WIOA participants who through a individual training account, who are not apprenticeship related, then you would need to seek the approval of, go through the state's process and be approved. And then once you are approved on the program of study, you would be subject to performance reporting.

So it depends whether what your status is. And then there are some individual, I'm sure, circumstances that we would have to take a closer look at, but generally speaking, if you are solely there as the provider for apprenticeship, you don't need to be on the list. If you want to be taking information. If you want to be broader than that, then you're going to need to seek approval from your state.

MR. RIDGEWAY: Ok, thank you, Christina. So this leaves us, that were a few odds and ends questions about registered apprenticeship and reporting. I believe Kellen has a general thing that covers those questions generally speaking. So I'll turn it over to him real quick

MR. GRODE: What it looks like is some red shirt ridership sponsors about to the extent that these requirements apply to them, does the webinar to them, that sort of thing. And so I just wanted to sort of give a general statement, which is that while registered apprenticeship programs are not required to report performance for the ETP reporting.

They are automatically eligible to be on the ETP lists and states are supposed to design an easy process by which they can get on the state list. The other thing about registered apprenticeships is that there may be value, that the program sees value in providing this performance information, because it will be, you know, displayed publicly, they may choose to provide that information, if they wish.

They don't have to not report just because they're not required to report. So I think that's another important note for folks. But yes, so for the questions that we got about whether or not this was requirements for them, I'd say the performance reporting component is not a requirement for registered apprenticeship sponsors specifically. So that's an important note I would say.

MR. RIDGEWAY: OK. OK, great. Thanks, Kellen. Just got a couple more minutes and there's a couple important ones I do want to iterate again.

We did get a question about when is the PY 2018 report due and then more generally, what is the beginning and end dates of a program year. So first question is PY 18 covers July 1st of 2018 to June 30th of 2019. And the report is due to DOL on October 1st of 2019. So a year, almost a year from now. However, the timeframe in which that report covers., we're in it right now. So we're in the first quarter of program year 2018. So we did want to make sure that we went over that with everyone. So there's not a report due this coming October in two weeks.

However, there are some aspects of the reporting that you probably need to be working on now. So we do want to go ahead and cover that. Another thing that I definitely want to cover is, we did talk a little bit about those waivers that some states that have gone on some of the reporting requirements.

And we got a question on that. "Is there a list of states with waivers for all participants available?" Uh, we do have a website where we publish that information on all waivers and I can give you the URL: doleta.gov/WIOA/WIOA\_waivers.cfm. And we can probably find a way to share that link. I don't know if there's a way to share that link to the participants on the call or John I think will do that.

So if people want to see not only ETP waivers, but all the waivers that have been issued by the department in the past year or so we encourage you to visit that. And again, that applies directly to states getting the waivers from, the Department of Labor. And then within each state, if you're operating within a state, of course you'll have to ask your state how that does or doesn't impact you. So we give them the waivers to the states and then we go from there. So if you have questions and you're not a state, talk to your state. So that would be the key on that point.

And so I think we're about what we just said 2:00. So I think we know there's some other questions that have come in and we do want to be sure to answer them in the near future. So we will be doing a webinar in the not too distant future on basically dedicated to going over some of these other questions that you've had. So continue to type those in as you get them. In the meantime, you can also type questions into a ETAPerforms@dol.gov .

If you have questions about the system of reporting, the workforce integrated performance system or WIPS, you can email the WIOA.Feedback@dol.gov. And so we encourage you to use that contact information and we'll use that to help inform our next webinar to be sure and help states and providers and local areas meet some of the requirements of this ETP reporting.

And with that, it's 2:00. We want to thank everyone for attending today. We know there's a lot to be thrown at you. So we know there will be questions and we expect that and we will look forward to working with you on those questions. And so with that, we also want to thank Matt for his time and joining us and all the tools that he's developed. We really think they are useful for you as a state and providers to help you meet these requirements while also doing it in a safe and secure environment.

So thank you Matt for your time and everything that you've done on this and we will talk to you all soon. Have a great rest of your day.

(END)